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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSHUA A. MARTINEZ,

14 Defendant.

15 Case No. 2:21-cr-00219-APG-DJA

16 **STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Schiess,
18 Assistant United States Attorney, counsel for the United States of America, and Joanne L.
19 Diamond, Assistant Federal Public Defender, counsel for Joshua Martinez, that the Court
modify his conditions of release.

20 The Stipulation is entered into for the following reasons:

21 1. On September 10, 2021, the Court ordered Mr. Martinez's release on a
22 personal recognizance bond with certain conditions, including a prohibition on travel to Las
23 Vegas, unless it is for a purpose and to a location as specified in the Appearance Bond, and
24 with the prior permission of Pretrial Services. ECF No. 13 at 6.

25 2. In addition to being on Federal Pretrial Release, Mr. Martinez is under pretrial
26 supervision by the State of Nevada. The conditions of Mr. Martinez's state supervision

1 require him to check in periodically at the Clark County Detention Center. The Clark County
2 Detention Center is not currently an approved location for Mr. Martinez to visit in Las Vegas.

3. Mr. Martinez moves the Court to modify his conditions to permit him to travel
4 to the Clark County Detention Center for purposes of complying with the conditions of his
5 state supervision, with the prior permission of Pretrial Services.

6. Counsel has spoken with Pretrial Services concerning this issue. Pretrial
7 Services support the requested modification.

8. The government has no objection to the requested modification.

9 DATED this 29th day of September, 2021.

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11 RENE L. VALLADARES
Federal Public Defender

12 CHRISTOPHER CHIOU
Acting United States Attorney

13 /s/ *Joanne L. Diamond*
14 By _____
15 JOANNE L. DIAMOND
Assistant Federal Public Defender

16 /s/ *Daniel Schiess*
17 By _____
18 DANIEL SCHIESS
19 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JOSHUA A. MARTINEZ,
Defendant.

Case No. 2:21-cr-00219-APG-DJA

ORDER

JOSHUA A. MARTINEZ,
Defendant.

IT IS THEREFORE ORDERED that Mr. Martinez's conditions of release be modified to allow him to travel to the Clark County Detention Center for purposes of complying with the conditions of his state supervision, with the prior permission of Pretrial Services.

DATED this 30th day of September, 2021.

UNITED STATES MAGISTRATE JUDGE